

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Hon. Terrence G. Berg

Plaintiff,

Case No. 19-20772

vs.

MATHEW MERCER-KINSER

Defendant.

**EX PARTE MOTION FOR AUTHORIZATION TO OBTAIN AN
EXPERT IN PSYCHOLOGICAL EVALUATIONS TO ASSIST IN
SENTENCING AT GOVERNMENT EXPENSE**

NOW COMES the Defendant, MATHEW MERCER-KINSER, by and through his panel attorney, Kimberly W. Stout, and moves this Honorable Court pursuant to the Criminal Justice Act, sub-section (e) of 18 U.S.C. § 3006A, for an Order for authorization to obtain an expert for a forensic psychological evaluation of the Defendant to assist with sentencing and to be paid out of funds appropriated for the administration of the Act. In support, Defendant states as follows:

1. Mr. Mercer-Kinser was convicted of Receipt and Possession of Child Pornography, among other things, in violation of 18 U.S.C. §2251(a) and 2252A(a)(5). His mandatory minimum is 15 years.

4. Dr. Atara Abramsky, a panel expert in psychological evaluations will evaluate Mr. Mercer-Kinser and provide a report to the Court and Probation to assist in sentencing for a \$2,700.00 non-refundable retainer. This evaluation is necessary for undersigned counsel to develop a Sentencing Memorandum for Mr. Mercer-Kinser who is facing many years in prison. **Exhibits A (C.V.).**
5. Guidelines promulgated by the U.S. Judicial Conference (Guidelines for the Administration of the Criminal Justice Act, Volume VII, *Guide to Judiciary Policies and Procedures*) provide that applications shall be heard in camera.

WHEREFORE, Defendant respectfully requests this Honorable Court authorize him through counsel to obtain an expert in psychological evaluation at Government Expense.

Respectfully submitted,

/s/Kimberly W. Stout
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